

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:15cr191
)	
RONALD B. CHANEY III,)	
)	
<i>Defendant.</i>)	
_____)	

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Counts One and Two of the Indictment are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. From in or around October 2015, to on or about November 8, 2015, in the Eastern District of Virginia, defendant, RONALD B. CHANEY III, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others to commit the offense of robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a).

2. On or about November 8, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, defendant, RONALD B. CHANEY III, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess certain firearms and ammunition, in and affecting interstate and foreign commerce, and did aid and abet another in doing so, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

3. In or around October 2015, CHANEY knowingly became part of a plan with others to take jewelry, precious metals, and U.S. currency from a local jewelry distributor by force and threats of violence. The jewelry distributor engaged in interstate commerce. In accordance with this plan, CHANEY's was enlisted by another co-conspirator to assist in the robbery to take place sometime in November 2015.

4. As part of the plan, on October 25, 2015, CHANEY accompanied a co-conspirator to meet with an individual whom they believed was a jewelry distributor and who was the intended victim for their planned robbery. The person who the defendant and his co-conspirator met with that day was actually an undercover FBI agent, who had previously been inserted in place of the jeweler. The co-conspirator placed an order to purchase approximately \$100,000 worth of jewelry and precious metals. Another meeting was planned to take place where, instead of purchasing this property, the conspirators would rob the individual of the ordered items, as well as any other valuable property or currency that the jeweler had in his possession at the time. The attempted robbery never took place because the defendant and his co-conspirator were arrested beforehand as discussed below.

5. CHANEY also assisted in a plan to purchase firearms and explosives for himself and a co-conspirator. Both CHANEY and the co-conspirator had each previously been convicted of a crime punishable by imprisonment for a term exceeding one year. The co-conspirator made arrangements for the purchase of these firearms with an individual who, unbeknownst to him, was working for the FBI. After meeting with this person, the co-conspirator picked the specific firearms and explosive he wished to purchase, and set a proposed meeting to purchase these weapons to take place sometime in early November.

6. On November 8, 2015, the co-conspirator called the undercover FBI contact and agreed to meet and purchase these weapons; however, later that morning it was CHANEY who arrived at the meeting to conduct the transaction. After CHANEY paid for the firearms and an explosive device, FBI agents immediately arrested CHANEY. Shortly after CHANEY's arrest, agents arrested the co-conspirator as well.


7. The firearms and explosive device that the co-conspirator ordered and CHANEY paid for and attempted to collect are described as follows:

- a. **One Colt Industries, M-16A, 15.56 mm assault rifle, serial number 4864576;**
- b. **One Silencer, Model QDSS-NT4, serial number T5944;**
- c. **One HK, Model Mk23, .45 caliber pistol, serial number 23-0185; with silencer;**
- d. **One Industrial use cast booster explosive with detonation cord and explosive blasting caps;**

all of which had traveled in interstate or foreign commerce prior to the co-conspirator's order and CHANEY's purchase of them in Virginia on November 8, 2015.


I have consulted with my attorney regarding this Statement of Facts and committed the acts described herein knowingly, intentionally, willfully and without legal justification or excuse, with the specific intent to do that which the law forbids, and not by mistake, accident, or any other reason. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

3/10/16
Date


Defendant

I am counsel for defendant, RONALD B. CHANEY III. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

3/10/16
Date


Counsel for Defendant

DANA J. BOENTE
UNITED STATES ATTORNEY

By:


Peter S. Duffey
Assistant United States Attorney